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April 1, 2020

VIA ECF

Honorable Paul A. Crotty
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Spinelli*, 19-CR-414 (PAC)

Dear Judge Crotty:

We represent defendant Doreen Spinelli in the above-captioned matter. Ms. Spinelli is scheduled to be sentenced before Your Honor on April 9th. However, due to the unprecedented effects that the coronavirus has caused on the court system and the legal representation of our clients, we believe a postponement of the sentencing to a later date is unfortunately necessary. The government consents to the adjournment. Currently, Ms. Spinelli remains in custody at the Metropolitan Detention Center and we have been unable to have attorney visits with her to review her sentencing memorandum. We do not know when visits will be permitted again.

Because the future of this pandemic is unknown and we do not know when court and jail operations will return back to normal, we do not have any particular date in mind and will defer to the Court as to a future sentencing date.

Thank you for your consideration of this request.

Respectfully submitted,

/s/
John Meringolo, Esq.

CC: All counsel (via ECF)